

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (SCRANTON)**

UNITED STATES OF AMERICA : 3-CR-19-111
 : (Judge Mannion)
vs. : (Electronically Filed)
NICHOLAS STANLEY, :
 Defendant. :

**NICHOLAS STANLEY'S UNOPPOSED MOTION
TO CONTINUE JURY SELECTION AND TRIAL AND
TO ENLARGE THE TIME TO FILE PRETRIAL MOTIONS AND BRIEFS**

COMES NOW, Defendant Nicholas Stanley through the undersigned, Derek A. Jordan, and hereby files this Unopposed Motion to Continue the Motion Deadline, Jury Selection and Trial from the currently scheduled dates of May 8, 2019 (Motion Deadline) and June 17, 2019 (Jury Trial) until August 8, 2019 and September 9, 2019, respectively. (Dkt. No. 10 – Scheduling Order). In support thereof, it is averred as follows:

1. The Defendant was indicted on April 2, 2019. (Dkt. No. 01).
2. On January 17, 2019 Nicholas Stanley's Arraignment was held. The Court set the motion deadline for May 8, 2019 and scheduled jury selection and trial for June 17, 2019. (Dkt. No. 10 – Scheduling Order).
3. After discussions with the government regarding the initial discovery provision and scheduling the parties believe it would be appropriate to move forward both scheduled dates

approximately 90 days until August 8, 2019 and September 9, 2019 (or thereafter) and respectfully request this relief from the Court. Hence, this motion is unopposed.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the Defendant sufficient time to effectively and thoroughly research, prepare and file appropriate pretrial motions, review discovery and prepare for trial.

5. The additional time requested by this motion is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161 (h)(7)(A), considering the factors under 18 U.S.C. § 3161(h)(7)(B)(i-iv).

WHEREFORE, Nicholas Stanley respectfully requests the currently scheduled motion deadline be extended until August 8, 2019 and jury selection and trial be continued until September 9, 2019.

DATED: April 26, 2019

By: /s/ Derek A. Jordan
Derek A. Jordan
Counsel for Nicholas Stanley

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CERTIFICATE OF SERVICE

It is hereby certified the foregoing MOTION TO CONTINUE THE MOTION DEADLINE, JURY SELECTION AND TRIAL DATE was made through the Court's electronic filing and notice system (CM/ECF), or, as appropriate by sending of copy of the same by electronic mail to the following address:

Alisan V. Martin
Assistant United States Attorney
U.S. Attorney's Office
240 West Third Street
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Williamsport, PA 17701-6465
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DATED this 26th day of April 2019.

/s/ Derek A. Jordan
Derek A. Jordan, Esq.